

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8 1595 Wynkoop Street DENVER, CO 80202-2466 Phone 800-227-8917 http://www.epa.gov/region08

Ref: 8EPR-SR

June 6, 2017

ROUX ASSOCIATES INC

Michael Ritorto Principal Hydrogeologist/RI Manager 209 Shafter Street Islandia, New York 11749

Re: CFAC Main Plant Building Pot Room #1- Crushed Concrete Backfill Approval Request Columbia Falls Aluminum Company, Columbia Falls, Montana

Dear Mr. Ritorto:

Upon review of your request, the U.S. Environmental Protection Agency (EPA) has no objection under the CERLCA provisions to using the ground floor and structural concrete from Pot Room #1 for use as subgrade fill material as part of the ongoing Site demolition activities being performed by Calbag. However, we recommend that the concrete to be removed from the building and crushed be pressure washed and the floor cleaned using a mechanical floor scrubber prior to use as backfill and after the existing waste materials are removed.

Please note: Although the EPA has no objection to your request to use the crushed concrete for backfill, the final approval must be coordinated with the Montana Department of Environmental Quality (MDEQ) per the Final Waste Management Plan and Schedule for Columbia Falls Aluminum Company Building I as required per the Administrative Order on Consent. [FID 2386]. In addition coordination with MDEQ's Solid Waste Program and their determination for placement of this material under the Montana Solid Waste Management Act.

Sincerely,

Mike Cirian, P.E. EPA Onsite Remedial Project Manager

cc: John Stroiazzo, Glencore Steve Wright, Columbia Falls Aluminum Company Lisa DeWitt, Montana Department of Environmental Quality Cory Mikita, Montana Department of Environmental Quality Andrew Baris, Roux Associates